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October 1, 2024

Hon. Eric R. Komitee  
Judge, United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11232

Re: *United States v. Musah Coward*, 21 Cr. 572 (EK)

Dear Judge Komitee,

I write in short reply to the government's letter dated October 1, 2024, seeking a protective order in this case. Mr. Coward opposes the government's proposed order for a Protective Order here as the one as drafted is not narrowly tailored to achieve the stated goals, and interferes with Mr. Coward's ability to prepare his defense.

During a meet and confer with the United States counsel for Mr. Coward raised certain concerns about the protective order. The concerns included: (i) counsel's inability to provide to Mr. Coward any discovery marked "sensitive discovery" especially since the proposed protective order does not provide for periodic review of what constitutes "sensitive discovery"; and (2) counsel's inability to discuss any part of discovery marked "AEO" with our client. Both interfere with Mr. Coward's ability to prepare for trial. We sought clarity from government counsel as to the contours of what may or may not be shared with Mr. Coward and given that we would be able to share none of the AEO marked information with the client, we consider the limitation to be overbroad.

To the extent the Court wishes to have oral argument on these issues, we are available to the Court, and note again that the government has redacted (or can redact) from the discovery produced to the defense all pedigree and contact information for its witnesses. For that reason alone, it is unclear how or why the government continues to seek such restrictive language in the proposed protective order.

Respectfully submitted,

/s/ Sabrina Shroff  
Gary Villanueva

Counsel for Musah Coward